

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : Criminal No.: _____
v. : Date Filed: _____
ZORAYA QUINTERO : Violations:
: 18 U.S.C. § 1001 (false statements –
: 1 count)
: 18 U.S.C. § 1546(a) (misuse of birth
: certificates - 3 counts)
: 18 U.S.C. § 2 (aiding and abetting -
: 3 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 2 and 3, 2004, at Philadelphia International Airport, in the Eastern District of Pennsylvania, defendant

ZORAYA QUINTERO,

in a matter within the jurisdiction of the United States Bureau of Immigration and Customs Enforcement, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant **ZORAYA QUINTERO** claimed that two juvenile boys, G.S. and W.G., and one juvenile girl, Z.B.M., traveling with her were the true owners of United States birth certificates in the names of W.P., H.D.B. and T.S., citizens of the United States, which defendant **ZORAYA QUINTERO** presented to a United States

Customs and Border Patrol Officer so that the juveniles could gain entry into the United States, when in fact, the juveniles are citizens of the Dominican Republic, and not the true owners of the United States birth certificates.

In violation of Title 18, United States Code, Section 1001.

COUNT TWO

THE GRAND FURTHER JURY CHARGES THAT:

On or about August 2, 2004, at Philadelphia International Airport, in the Eastern District of Pennsylvania, defendant

ZORAYA QUINTERO,

when applying for admission to the United States on behalf of G.S., a juvenile citizen of the Dominican Republic, aided and abetted G.S. to personate another and attempt to evade the immigration laws of the United States by presenting to a Custom and Border Patrol Officer a United States birth certificate in the name of W.P. on behalf of G.S., without disclosing the true identity of G.S. and the fact that he is not a United States citizen.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT THREE

THE GRAND FURTHER JURY CHARGES THAT:

On or about August 2, 2004, at Philadelphia International Airport, in the Eastern District of Pennsylvania, defendant

ZORAYA QUINTERO,

when applying for admission to the United States on behalf of W.G., a juvenile citizen of the Dominican Republic, aided and abetted W.G. to personate another and attempt to evade the immigration laws of the United States by presenting to a Custom and Border Patrol Officer a United States birth certificate in the name of H.D.B. on behalf of W.G., without disclosing the true identity of W.G. and the fact that he is not a United States citizen.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2, 2004, at Philadelphia International Airport, in the Eastern District of Pennsylvania, defendant

ZORAYA QUINTERO,

when applying for admission to the United States on behalf of Z.B.M., a juvenile citizen of the Dominican Republic, aided and abetted Z.B.M. to personate another and attempt to evade the immigration laws of the United States by presenting to a Custom and Border Patrol Officer a United States birth certificate in the name of T.S. on behalf of Z.B.M. without disclosing the true identity of Z.B.M. and the fact that she is not a United States citizen.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney